IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

WOODROW BRATCHER, JR., individually and on behalf of all	<i>\text{\ti}\text{\ti}}\\ \text{\text{\text{\text{\text{\text{\text{\text{\tex{\tex</i>	
others similarly situated	§ 8	
Plaintiffs,	\$ \$	
V.	9 §	Civil Action No. 5:18-cv-00631
DIRECTIONAL PROJECT SUPPORT, INC. and WILLIAM	& & &	
GARDNER	\$ &	JURY DEMANDED
Defendants.	3	

JOINT MOTION TO EXTEND DISPOSITIVE MOTIONS AND DISCOVERY DEADLINES

To the Honorable Magistrate Judge Richard B. Farrer:

- 1. Plaintiff Woodrow Bratcher, Jr. and Defendants Directional Project Support, Inc. and William Gardner ask the Court to extend the present dispositive motions deadline of November 30, 2020 until January 15, 2021 and the present discovery deadline of December 17, 2020 until January 15, 2021.
- 2. The parties are in the process of taking virtual depositions that they need in order to prepare and file dispositive motions, and the additional time will allow them to complete depositions and file meaningful motions.
- 3. The parties are in settlement negotiations and are attempting to come to an agreement.

This motion is not brought merely for purposes of delay, but so that the parties can finish necessary discovery, potentially reach a settlement, and, in the alternative, prepare meaningful dispositive motions.

Respectfully Submitted,

THE BUENKER LAW FIRM

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ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Procedure, I hereby certify a true and correct copy of the foregoing has been served on all parties and counsel of record, including the following on November 30, 2020:

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Counsel for Plaintiff

/s/ Anthony L. Laporte /s/ Anthony L. Laporte